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Pesticides Regulation Division

JUN 21 1972

Great Lakes Chemicals Company
c/o Laurence & Laurence
753 Warner Building
Washington, D. C. 20004

Gentlemen:

Subject: TERR-O-GAS 98 PREPLANT SOIL
EPA Reg. No. 5785-22
Your application of March 21, 1972

We acknowledge your submission of March 21, which included a letter and attachment from Martin Kolbezen. Mr. Kolbezen comments on the specific items outlined to you in our letter of November 29, 1971.

We do not feel that the information submitted alters any of the requirements set forth in our letter of November 29, 1971. We offer the following comments relative to Mr. Kolbenzen's letter:

1. We do not contest that armillaria is a major problem at the crop sites mentioned. However, each food crop site named would require residue information as suggested in our previous letter, comment 2.

A. and B. - If there are additional data available as suggested by these paragraphs, they should be submitted.

C. It is our opinion that phytotoxicity determinations certainly are necessary. We know of crops that are bromine sensitive, that bromides build up in the soil and that bromide levels in many crops are increased as a result of soil fumigations with bromine - containing chemicals.

D. and E. - The data previously submitted does not appear to fit the grape vineyard recommendation. The data from which the recommendation is based should be submitted and the labeling for the product should be revised appropriately.

F. G. H. - No comment.

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Finally, referring to the last paragraph in the Kolbenzen letter, we believe we should be furnished the same research information from which Mr. Kolbenzen and his associates base their conclusions.

As Mr. Caswell informed Mr. Centola on March 13, 1971, we will withdraw comment #1 of our letter of February 22, 1972.

Sincerely,

T. E. Adamczyk
Chief
Fungicide-Herbicide Branch

EPA:P:TEAdamczyk:iba:6-21-72

T.A.

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